

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

|  |   |                                    |
|--|---|------------------------------------|
| WSOU Investments LLC                     | § |                                    |
| doing business as                        | § |                                    |
| Brazos Licensing and Development,        | § |                                    |
|  | § | Civil Action No. 6:20-cv-00957-ADA |
| Plaintiff,                               | § | Civil Action No. 6:20-cv-00958-ADA |
|  | § |                                    |
| v.                                       | § |                                    |
|  | § | Jury Trial Demanded                |
| OnePlus Technology (Shenzhen) Co., Ltd., | § |                                    |
|  | § |                                    |
| Defendant.                               | § |                                    |

**DECLARATION OF MICHAEL LYONS IN SUPPORT OF  
DEFENDANT’S OPENING CLAIM CONSTRUCTION BRIEF (GROUP 2 PATENTS)**

I, Michael J. Lyons, declare as follows:

1. I am an attorney with the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“Defendant”) in the above-captioned action and am admitted *pro hac vice* in this action. I have personal knowledge of the statements contained in this Declaration which are true and correct and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 8,712,708.

3. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 9,231,746.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the 12<sup>th</sup> Edition Chambers Dictionary. The document was produced as ONEPLUS\_0004029-ONEPLUS\_0004031.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts of the Third Edition New Oxford American Dictionary. The document was produced as ONEPLUS\_0004032-ONEPLUS0004034.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts of the Third Edition Webster's New College Dictionary. The document was produced as ONEPLUS\_0004035-ONEPLUS0004037.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of August 2021, in Los Altos, California.

/s/Michael J. Lyons  
Michael Lyons